

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HUDSON PRIVATE LP and
HUDSON PRIVATE CORP.,

Plaintiffs,

v.

BRON STUDIOS USA, INC., BRON CREATIVE USA,
CORP., CREATIVE WEALTH MEDIA FINANCE
CORP., and JASON CLOTH,

Defendants.
-----X

:
: Case No. 7:21-cv-08259-CS
:
: ~~PROPOSED~~
: **ORDER TO SHOW CAUSE**

UPON the reading of the Memorandum of Law, Declaration of Christopher Conover, and the exhibits thereto, Declaration of Kevin Fritz, Esq., and the exhibits thereto (the "Motion Papers"), and for good cause appearing therefor, it is hereby

ORDERED, that defendant Creative Wealth Media Finance Corp. ("Defendant") show cause before this Court at the United States Courthouse, 300 Quarropas Street, Courtroom 621, White Plains, NY 10601, on ~~February~~ ^{March} 5, 2024, at 2:30 ^p.m., or as soon thereafter as counsel may be heard, why an order should not be issued:

(1) pursuant to Federal Rule of Civil Procedure 55(b)(2), striking Defendant's Answer and Counterclaims and granting plaintiffs Hudson Private LP ("Hudson LP") and Hudson Private Corp. ("Hudson Corp." and together with Hudson LP, "Hudson" or "Plaintiffs") a default judgment against Defendant, based upon Defendant's failure to retain substitute counsel within the timeframe permitted by the Court (docket entry 12/20/23), as follows:

- a. on the First Cause of Action for breach of the Fonzo Term Sheet, a monetary judgment, in favor of Hudson LP, in the amount of \$4,371,758.04;

- b. on the Third Cause of Action for breach of the Fonzo Participation Agreement, directing Defendant to account to Hudson LP for the latter's share of proceeds due in connection with the Fonzo Loan;
- c. on the Fourth Cause of Action for breach of the Greyhound Term Sheet, a monetary judgment, in favor of Hudson LP, in the amount of \$2,210,374.10;
- d. on the Seventh Cause of Action for breach of the Bombshell Term Sheets and Bombshell Participation Agreements: (i) a monetary judgment, in favor of Hudson LP, in the amount of \$5,094,297.25; and (b) a monetary judgment, in favor of Hudson Corp., in the amount of \$6,773,749.95;
- e. on the Ninth Cause of Action for breach of the Bombshell Participation directing Defendant to account to Plaintiffs for the latter's share of proceeds due in connection with the Bombshell Loans;
- f. on the Tenth Cause of Action for breach of the Harry Haft Term Sheet, a monetary judgment, in favor of Hudson LP, in the amount of \$6,494,686.88;
- g. attorneys' fees and costs in the amount of \$154,046.23; and

(2) granting Plaintiffs such other and further relief as the Court deems just and proper; and

IT IS FURTHER ORDERED that any affidavits or other papers of Defendant in opposition to Plaintiffs' application shall be served upon Plaintiffs' counsel by electronic filing pursuant to the rules of this Court no later than February 22, 2024 and any reply papers by Plaintiffs shall be served by electronic pursuant to the rules of this Court no later than February 29, 2024; and

IT IS FURTHER ORDERED, that Plaintiffs shall serve a copy of this Order and the Motion Papers upon Defendant, via overnight delivery, on or before February 8, 2024.

at Defendant's place of business, and via electronic means to any attorney or trustee known by Plaintiffs to be representing Defendant or standing in the shoes of Defendant,

DATED: New York, New York

February 1, 2024

Cathy Seibel

Hon. Cathy Seibel, United States District Judge